1 Rene L. Valladares Federal Public Defender 2 Nevada State Bar No. 11479 *Ron Y. Sung 3 Assistant Federal Public Defender 4 Nevada State Bar No. 13047 411 E. Bonneville Ave., Ste. 250 5 Las Vegas, Nevada 89101 (702) 388-6577 6 Ron_Sung@fd.org 7 *Attorney for Petitioner Thomas Supranovich 8 9 10 United States District Court 11 DISTRICT OF NEVADA Thomas Supranovich, 12 Case No. 2:21-cv-01269-RFB-BNW Petitioner, 13 **Unopposed Motion for Extension** 14 v. of Time to File First Amended Petition William Hutchings, et al., 15 (Second Request) 16 Respondents. 17 18 19 20 21 22 23 24 25 26 27

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POINTS AND AUTHORITIES

Petitioner Thomas Supranovich asks this Court to enter an Order extending his deadline for filing his first amended petition from May 4, 2023, by 60 days until July 3, 2023. This is Supranovich's second request for an extension. Respondents do not oppose this request.

Supranovich filed a *pro se* 28 U.S.C. § 2254 petition for writ of habeas and a request for appointment of counsel with this Court on July 2, 2021. On July 15, 2022, this Court granted Supranovich's request for appointment of counsel and appointed the Federal Public Defender. On August 8, 2022, undersigned counsel appeared for Supranovich.

Counsel has been diligently working on Supranovich's case. Since appointment, counsel has obtained court records, prior counsel's records, and met with client. Counsel recently met with an expert to assess Supranovich's claims. Counsel now needs to time draft the amended petition. Accordingly, Supranovich requests a 60-day extension to file his amended petition by July 3, 2023.

On May 4, 2023, counsel for Respondents, Deputy Attorney General Matthew Johnson, indicated by email that Respondents do not oppose this request with the understanding that Respondents' lack of objection is not waiver of any procedural defenses or statute of limitations challenges or construed as agreeing with the accuracy of the representations made in this Motion.

¹ ECF Nos. 1-1, 1-2.

² ECF No. 7.

³ ECF No. 10.

Dated May 4, 2023. Respectfully submitted, Rene L. Valladares Federal Public Defender /s/ Ron Y. Sung Ron Y. Sung Assistant Federal Public Defender IT IS SO ORDERED: RICHARD F. BOULWARE, II UNITED STATES DISTRICT JUDGE DATED this 5th day of May, 2023.